

United States District Court
Southern District of New York

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LAURA K. and PHILLIP K, as parents
and best friends of their infant daughter
"C", ANGELA M. and MICHAEL M., as
parents and best friends of their infant
daughter "M", and KATHY D. and JOSEPH
D. as parents and best friends of their
Infant daughter "J",

07 Civ. 10536 (WCC)

ANSWER

Plaintiffs,

-against-

JANA RINALDO, individually, RHONDA
HUEMANN, individually, JANE DOE,
Individually, MARY ROE, individually, and
The UWCA, a non-profit association,
BRIAN ROBBINS, individually and in his
Capacity as a Detective in the Police
Department of The City of White Plains,
N.Y., ERIC FISHER, Individually and in his
Capacity as a Detective Sergeant in the
Police Department of the City of White
Plains, N.Y., and ANNE FITZSIMMONS,
Individually and in her capacity as
Assistant Chief of Police of the Police
Department of The City of White Plains,
N.Y.

Defendants.

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Defendant Jana Rinaldo, by her attorneys, Kenny, Stearns & Zonghetti, 26
Broadway, New York, New York 10004 (212) 422-6111 and Robert G. Schneider,
Esq., 576 Kimball Avenue, Yonkers, New York 10704 (914) 946-2828, as and
for her Answer to the Complaint, states upon information and belief:

1. Denies the allegations of paragraph 1 - 2 of the Complaint.

2. Denies knowledge or information sufficient to form a belief as to the truth of the matters asserted in paragraphs 3 - 5 of the Complaint.

3. Denies the allegations of paragraphs 6 - 8 of the Complaint.

4. Denies knowledge or information sufficient to form a belief as to the truth of the matters asserted in paragraphs 9 - 12 of the Complaint.

5. Denies the allegations of paragraphs 13 - 17 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the truth of the matters asserted in paragraphs 18 - 22 of the Complaint.

7. With respect to paragraph 23 of the Complaint, repeats and realleges each and every denial and denial of knowledge and information above as though fully restated here.

8. Denies the allegations of paragraph 24 of the Complaint.

9. With respect to paragraph 25 of the Complaint, repeats and realleges each and every denial and denial of knowledge and information above as though fully restated here.

10. Denies the allegations of paragraph 26 of the Complaint.

11. With respect to paragraph 27 of the Complaint, repeats and realleges each and every denial and denial of knowledge and information above as though fully restated here.

12. Denies the allegations of paragraph 28 of the Complaint.

13. With respect to paragraph 29 of the Complaint, repeats and realleges each and every denial and denial of knowledge and information above as though fully restated here.

14. Denies the allegations of paragraph 30 of the Complaint.

AS AND FOR A FIRST DEFENSE:

15. Plaintiffs fail to state claims upon which relief may be granted.

AS AND FOR A SECOND DEFENSE

16. Plaintiffs lack personal jurisdiction over answering defendant.

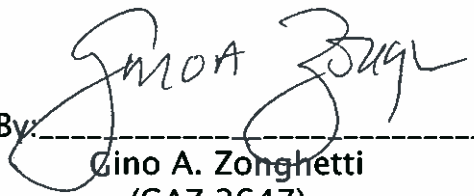
AS AND FOR A THIRD DEFENSE

16. Plaintiffs lack subject matter jurisdiction over the claims against answering defendant.

WHEREFORE, defendant Jana Rinaldo demands judgment in her favor and against plaintiffs, including for costs, disbursements and attorneys' fees, and for such other or further relief the Court may deem to be just and proper.

Dated: New York, New York
January 17, 2008

Kenny, Stearns & Zonghetti
Attorneys for Defendant
Jana Rinaldo

By: 
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